

Alex Kosovskiy
44 Avonwood Road
Unit 203
Avon CT 06001

Hon. Jill Mazer-Marino
U.S Bankruptcy Court, EDNY
Conrad B. Duberstein Courthouse
271-C Cadman Plaza East – Suite 1595
Brooklyn, NY 11201-1800

Dear Judge,

I am a resident of the Avon Place Complex, where I have lived for the past 25 years. The complex includes both individually owned condominium units and those owned by a real estate development firm. In 2022, Ahron Rudich, of Avon Place LLC, acquired a majority stake in the property. Since then, I and other individual unit owners have faced persistent intimidation and harassment intended to pressure us into selling our units to Avon Place LLC.

In one particularly disturbing phone conversation, Mr. Rudich told me that my children would "live on the street" if I did not agree to sell my unit under his terms. These threats have created fear and anxiety for my family and me.

In 2023 I was denied access to the community clubhouse when I attempted to host my daughter's 10th birthday party. Mr. Rudich's employee, Bret Hurst, physically padlocked the door to prevent my family and guests from entering, an act that was both unnecessary and cruel.

To make matters worse, in December of 2024, my second-floor apartment was severely flooded due to water damage originating from the unit directly above mine, which is owned by Avon Place LLC. Despite multiple requests, I have not received any insurance information from them. The damage has left my home in a compromised state, and I have been forced to pursue legal action in an effort to hold them accountable.

These events represent a pattern of hostility, neglect, and bad-faith dealings by Avon Place LLC and its representatives. I am bringing this to the Court's attention in the hope that appropriate legal remedies will be considered to protect myself and other affected residents.

I am also including a notice of violations/citations issued by Farmington Valley Health Department to Avon Place in 2023 and 2024 .

Thank you for your time and consideration.
Sincerely,
Alex Kosovskiy
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Avon Place
Avonwood Rd
Summary of NOVs and Complaints

NOTICE OF VIOLATIONS

- 9/24/2024 Building 48: mold growth in several locations in basement, active leak 3rd floor hallway, Unit 215 visible water damage, extensive trash outside of dumpsters
- 8/21/2024 Pool being used after failing all attempts to pass inspection for opening Poor water clarity, chlorine levels too low, pool gates not operating properly, emergency phone not functioning, chemical logs not present, no qualified pool operator on site. Closure signs had been removed.
- 11/3/2023 Failure to provide Hot Water
- 7/25/2023 Building 44: 3rd floor water damage, leaking pipes, basement water on floor and walls, moldy sheet rock, Building 47 units 103 and 104 sewage leaks, Building 48: Unit 106-HVAC system, Unit 112-mold in closet, dumpsters and garbage overflow.

Chronology of Events related to lack of hot water

- 3/30/23 First complaint received regarding lack of hot water building #44
- 3/30/23 D. Harding spoke to Empire Property Management
- Confirmed no hot water
 - Reported that Hotpoint was on site to analyze problem and repair/replace as needed
- 3/30/23 D. Harding sent email to Empire Property Management confirming conversation and requesting updates
- 3/30/23 additional tenant complaints received via phone and email-some indicating that this was not first occurrence but FVHD not previously engaged
- 3/30-4/4/23 regular communication with Brett and Empire regarding actions on site to restore hot water, complaints continue but property management assures us that they are doing everything they can to assess and fix the problem.
- 4/5/23 Reported that hot water was restored although some reports that it was luke warm. D. Harding and S. Johnson make site visit. Water temperatures documented between 112-116 in units 107 and 308 as well as first and second floor laundry rooms.
- 4/5/23 Case Closed
- 7/9/23 Complaint receive indicating no hot water again in building #44

- 7/10/23 D. Harding attempted to get an update on the situation from property management-no response
- 7/11/23 D. Harding sends another email requesting immediate update on hot water repair
- 7/11/23 extensive back and forth between D. Harding and Empire regarding owner information, who can authorize repairs, plans to restore hot water
- 7/11/23 Empire hires Taylor Energy, they report that boiler is too small for unit demands, lowered water pressure as short term remedy, new boiler quotes being requested
- 7/11/23 D. Harding asks about written orders-J.Kertanis does not issue order as remedy is moving forward. J. Kertanis speaks to Brett and requests that he offer relocation to anyone who requests given we are going on day 3 and timeline for full restoration is not clear
- 7/9-7/12 a few residents continue to update FVHD on lack of hot water, FVHD requests that Empire keep residents apprised of all actions, timelines and offer to relocate. D. Harding sent text indicating that Management must offer relocation to tenants affected. Brett responded that relocation of tenants could occur at Avon Place LLC expense
- 7/12/23 D. Harding received email from Empire indicating that Taylor Energy has found a part that should "fix" situation either later today or tomorrow
- D. Harding had email exchange with Taylor Energy directly regarding time frame for repair
- 7/13/23 Complaints that water is only luke warm, FVHD requests that Empire follow up with residents to determine if they have hot water and/or to offer relocation
- 7/14/23 FVHD receiving mixed messages, Empire reporting part installed and water heating up, some residents still reporting luke warm water.
- 4:30 pm water temp documented at 105 degrees
- 7/14/23 Temporary solution provides intermittent and inconsistent hot water, complaints continue and FVHD continues to emphasize relocation, Brett insists they have offered relocation but people don't like options, tenants report that they were never offered relocation. FVHD cc'd on some back and forth with tenants and property management regarding relocation and showers at community building. A major part of the new system was stolen from unlocked boiler room the evening all work was completed, resulting in no hot water again. Part was replaced. Recommended lockable doors, cameras in this area
- 7/20/23 3 new hot water tanks on line as of 2:45 pm
- 7/20/23 Case Closed
- 7/25/23 FVHD issued order regarding the water damage in basement, mold in common area,...

- 7/31/23 No hot water complaints received again
- 7/31/23 S. Johnson and M. Arnold conduct site visit—garbage build up, mold and other issues were part of complaint as was reporting of on and off hot water
- 7/31/23 S. Johnson followed up with Brett regarding the hot water, he reported that lack of hot water was associated with power outages the night before. Taylor Energy had come out to reset the units and it should not occur again.
- 8/04-8/28/23 Multiple communications (email, text, phone calls) between S. Johnson and B. Hurst regarding NOV and other complaints
- 8/17/2023 Meeting at Avon Town Hall with Town Manager, Social Services Director, Building Inspector, Fire Marshall and FVHD
- 10/05/23 On-site meeting with FVHD staff (D. Harding, P. Gigliotti and S. Johnson), Fire Marshal, Building Inspector, Albert (Avon Place Facilities staff) and B. Hurst
- 10-10-23 FVHD memo to Brett itemizes conditions witnessed on 10-5-23, discussions and information requests
- 10/22/23 More complaints regarding lack of hot water
- 10/22-11/9 Ongoing emails, texts from tenants complaining about ongoing hot water issue, some report periodic hot water but not consistent
- 10/31/23 Property Management reports hot water restored with temporary fix
- 10/31/23 D. Harding and P. Gigliotti make site visit at 1 PM and confirm hot water in units 102 and 313 Property management reports that there is problem with old heat exchanger and whole unit needs to be replaced. D. Harding provided update to Michelle Traub
- 11/1/23 Property Management provides FVHD with copy of proposal for new boiler and install
- 11/1/23 J. Kertanis places call to Atty. Ben Potak, listed as “agent” expressing frustration with situation, lack of communication from owner, intention to issue orders and request for any assistance in communicating with Mr. Ahron. Atty Potak sympathetic to our issues, indicated that he had nothing to do with the property other than manage the transfer said he would see if he could reach Mr. Ahron—nothing came of this.
- 11/1/23 Complaints again regarding no consistent hot water and no communication from property management
- 11/1/23 D/Harding sends very pointed text to Brett regarding ongoing issues, lack of communication and need for permanent repair. Also asked to speak to Ahron who is listed as owner and has been completely unresponsive

11/1/23 FVHD provides Michelle with information regarding 47a-13 and tenant rights as they continue to report that Empire is not providing relocation options

11/2/23 Back and forth texts with Brett regarding temporary fix of replacing wires that were shorting and reports that hot water was back up and running and that Brett will have his team on site to address ongoing issues

11/2/23 tenants reporting they are not getting communications from Empire, D. Harding texts Brett asking that they double check their communication system to ensure everyone is getting correspondence

11/2/23 Taylor Energy indicates that new boiler is required and is on order

11/3/23 FVHD issues orders

11/3/23 J. Kertanis has very pointed conversation with Brett emphasizes the requirements of the order including relocation, requests that he speak to Mr. Ahron and have him call FVHD, reiterated lack of communication both to tenants and FVHD. He indicated that boiler replacement would take place on 11/8 with full restoration of hot water

11/3-11/8 ongoing emails and texts regarding lack of hot water

FIRE INSPECTIONS

7/2024 Numerous site visits made to inspect units for reoccupancy

Miscellaneous Complaints:

6-21-23 Bldg 47 unit 103 & 104 sewage backup

6-29-23 Bldg 48 leak/mold

7-19-23 Bldg 44 water in basement/mold

8- 8-23 Bldg 48 Unit 106 water on ceiling/mold

8-17-23 Bldg 48 Unit 112 mold

1-16-24 Bldg 48 Unit 313 vermin

2-20-24 Bldg 48 Unit 303 no heat

3-25-24 Bldg 47 trash/garbage overflow

6-27-24 Bldg 47 Unit 305 mold from leak above kitchen

7-15-24 Bldg 48 Unit 101 mold

7-31-24 Bldg 48 Unit 301 mold
8-22-24 Bldg 48 Unit 303 mold
8-29-24 Bldg 48 Unit 215 mold
9-2-24 Bldg 48 trash/garbage
10-4-24 Bldg 48 unit 311 no hot water/heat
1-4-24 Bldg 48 unit 112 no heat/hot water
10-7-24 Bldg 48 Unit 301 no heat
12-10-24 Bldg 48 unit 120 no heat
12-16-24 Bldg 44 unit 104 no heat in foyer/hallway